

## **REMARKS**

Claims 1-6, 10-36, and 38-42 stand rejected. Claims 1, 3, 4, 10, 15, 18, 21, 25, 30, 35, and 39-42 have been amended. Claim 43 has been added.

### **Claim Amendments**

Claims 1, 3, 4, 10, 15, 18, 21, 25, 30, 35, and 39-42 have been amended and claim 43 has been added. Applicant submits that no new matter has been added. In particular, with respect to the amendments made to independent claims 1, 15, 18, 21, 25, 30, 35, and 39, support can be found at least in, for example, figure 4 and accompanying text on pages 9 and 10 of the specification. With regard to claim 43, support can be found at least in, for example, figures 6b-6d and accompanying description on pages 11-12 of the specification.

### **Rejections under 35 USC 103**

Claims 1-6, 10-11, 18, 21, 22, 25-27, 30-32, 35-36, and 39-41 stand rejected under 35 USC 103(a) over US Patent No. 6,415,294 issued to Niemi (“Niemi”) in view of US Patent No. 6,510,406 issued to Marchisio (“Marchisio”). Applicant respectfully disagrees.

Claim 1, as amended, recites an automated method for assisting a user of a client system in retrieving and browsing information, the method comprising:

retrieving, by the client system, and displaying on a display of the client system for browsing, a first information page having first contents, responsive to user direction; and

automatically assembling and augmenting, by the client system, the first information page being browsed with one or more information source identifiers directly identifying one or more information pages with second contents that may be additionally retrieved, the one or more directly identified information pages being selected based at least in part on second keywords determined to be related to first keywords present in the first information page and present in a list of keywords

provisioned based on user selection of a category of keywords, the second contents directly augmenting the first content.

Thus, claim 1 taken as a whole requires that the first keywords be present in a keyword list provisioned based on a user selection of a category of keywords. In this way, the method of claim 1 augments the first information page with information source identifiers identifying information sources relevant to the user's selected category of keywords.

In contrast, Niemi discloses a method of developing a list of keywords present in documents viewed by a client system over time (see table 1 and column 8 lines 39-48 of Niemi). Niemi builds a database of documents viewed on the client system, creates a dynamic database of keywords contained in those documents using a probabilistic measure, and then embeds search queries into all keywords present in newly-downloaded documents.<sup>1</sup> When selected by a user, the queries generate a list of all previously-viewed documents that also include the selected keyword along with a similarity calculation.<sup>2</sup> The similarity calculation is a measure of the total number of keywords the two documents have in common.<sup>3</sup> Thus, the generated list contains all documents containing the selected keyword and presents the user with a measure of how relevant each previously-viewed document is to the currently-viewed document, based on the dynamically determined keywords.

Niemi, in column 7 lines 37-44, describes that a user may force a word to be a keyword by giving it a "lifetime" value. Thus, a user interested in the internet may force the word "internet" to be a keyword, and the similarity measure of all documents would include the dynamically determined keywords as well as the forced keyword "internet". Once the lifetime value expires, the forced keyword would be retained only if it meets the probabilistic requirements discussed above. These "forced" keywords of Niemi are not keywords contained within a list provisioned based on "user selection of a category of keywords" as required by claim 1. Rather,

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<sup>1</sup> Niemi, col. 4, line 21, through col. 5 line 17.

<sup>2</sup> Niemi, col. 6 lines 52-60.

<sup>3</sup> Niemi, col. 6 line 62, through col. 7 line 13.

the forced keywords are single keywords provisioned based on user selection of the keyword itself. Thus, Applicant submits that Niemi does not teach or suggest each and every element of claim 1.

Further, there could have been no suggestion to modify Niemi to achieve the method of claim 1. The purpose of Niemi is to find previously-viewed pages relevant to the content of a currently-viewed page (Niemi column 6, lines 41-42). As discussed above, it does this in part by using a probabilistic measure to dynamically determine which words in all previously-viewed documents are relevant keywords. Dynamically determining keywords insures that the keywords are relevant to the collection of previously-viewed documents. As a result, the similarity measure of Niemi is based on keywords that are relevant to the documents being compared. This is critical to achieving the purpose of Niemi because unless the keywords are known to be relevant to the documents, a similarity measure of two documents using keywords does not necessarily indicate how relevant the two documents are to each other, rather it would indicate only the degree to which the two documents contain the same number of possibly irrelevant keywords.

Therefore, if the keyword database of Niemi were modified to include lists of keywords provisioned based on user selection of a category, it would be much less likely that the keywords themselves would be relevant to any previously-viewed documents and, accordingly, much less likely that the similarity measurement of Niemi would indicate how relevant the previously viewed documents are to the currently-viewed document. Even though Niemi does disclose user provisioning of forced keywords, one of ordinary skill would recognize that allowing the user to provision whole lists of keywords would cause Niemi to depart from its purpose of finding documents relevant to the currently-viewed page. Thus, provisioning lists of keywords based on user selection of a category would not help achieve the purpose of Niemi and, in fact, Niemi teaches away from such a modification. Applicant accordingly submits that there would have been no suggestion to modify Niemi to achieve the method of claim 1.

Further, Marchisio fails to remedy the deficiencies of Niemi. Marchisio

discloses allowing a user to select any term in a downloaded page in order to generate related keywords and to eventually obtain a list of documents that associate the selected term with a selected one of the generated keywords. (See Marchisio column 16, lines 38-58 and figure 9.) However, the cited text does not disclose provisioning a keyword list based on “user selection of a category of keywords” as required by claim 1. Thus, Marchisio fails to remedy the deficiencies of Niemi.

Thus, for at least these reasons, Applicant respectfully submits that the combination of Niemi and Marchisio fails to teach or suggest all elements of amended claim 1 and that claim 1 is therefore patentable over Niemi either alone or in combination with Marchisio.

In regards to claims 2-6, 10, and 11, each depends from claim 1. Thus, for at least the reasons cited above, Applicant respectfully submits that claims 2, 6, 10 and 11 are also patentable over Niemi. Independent claims 18, 21, 25, 30, 35, and 39 recite similar elements as claim 1. Thus, for at least the same reasons as claim 1, Applicant submits that claims 18, 21, 25, 30, 35, and 39 are also patentable over Niemi alone or in combination with Marchisio.

Claims 26-27, 31-32, 36, and 40-41 depend from claims 25, 30, 35, and 39, respectively. Thus, for at least the reasons discussed above, Applicant respectfully submits that claims 26-27, 31-32, 36, and 40-41 are also patentable over Niemi and Marchisio.

Claims 12-17, 19, 20, 23, 24, 28, 29, 33, 34, 38, and 42 stand rejected under 35 USC 103(a) over Niemi in view of Marchisio in further view of US Patent No. 6,271,840 issued to Finseth et al (“Finseth”).

Claims 12-14, 19-20, 23-24, 28-29, 33-34, 38, and 42 depend from claims 1, 18, 21, 25, 30, 35, and 39, respectively. As discussed above, Applicant submits that claim 1 is patentable over the combination of Niemi and Marchisio. Further Finseth fails to remedy the above-cited deficiencies of Niemi and Marchisio. Thus, for at least the reasons cited above in relation to claim 1, Applicant submits that claims 12-

14 , 19-20, 23-24, 28-29, 33-34, 38, and 42 are patentable over the combination of Niemi, Marchisio, and Finseth.

Independent claim 15 recites similar elements as claim 1. Further, claims 16 and 17 depend from claim 15. Thus, for at least the same reasons cited above, Applicant respectfully submits that claims 15-17 are patentable over the combination of Niemi, Marchisio, and Finseth.

New Claims

Claim 43 is added and depends from claim 1. Thus, for at least the same reasons discussed above in reference to claim 1, Applicant submits that claim 43 is patentable over the prior art.

Conclusion

Applicant respectfully asserts that all pending claims are in condition for allowance. Entry of the foregoing is respectfully requested and a Notice of Allowance is earnestly solicited. Please charge any shortages and credit any overages to Deposit Account No. 500393.

Respectfully submitted,  
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